

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

ePLUS INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:09CV620 (REP)
)	
LAWSON SOFTWARE, INC.,)	
)	
Defendant.)	

**DEFENDANT LAWSON SOFTWARE, INC.'S OBJECTIONS TO PLAINTIFF'S
EXHIBITS FOR CONTEMPT PROCEEDINGS**

Pursuant to the Court's Scheduling Order entered on March 12, 2013 (D.I. 1020)

Defendant Lawson Software, Inc. ("Lawson") hereby submits the following general and specific objections to Plaintiff ePlus Inc.'s ("ePlus") proposed exhibits for the contempt proceeding:

General Objections

1. Lawson objects to the inclusion in the record of any designated exhibit that is offered by ePlus but is not the subject of testimony at the contempt proceeding by a witness having personal knowledge of the document.

2. Lawson will reconsider specific objections stated below in the event that a document marked as an exhibit is offered at the contempt hearing through a witness with knowledge of the document. From ePlus's exhibit list, however, Lawson cannot determine which witnesses will actually testify about which documents on ePlus's exhibit list.

3. Lawson reserves its right to present additional objections to exhibits based on unanticipated uses of such exhibits.

4. Lawson objects to the introduction of any part of any exhibit designated by ePlus relating only or primarily to product configurations, product features, or patent claims not at issue in the contempt proceeding to be heard beginning on April 2, 2013.

5. The following documents were produced by Lawson pursuant to Court Order and over Lawson's assertion of privilege. Lawson maintains its objection to any use of these documents by ePlus.

- PX-1092
- PX-1097
- PX-1116
- PX-1218
- PX-1229
- PX-1230
- PX-1231
- PX-1232
- PX-1233
- PX-1234
- PX-1235
- PX-1236
- PX-1237
- PX-1238
- PX-1239
- PX-1240
- PX-1250
- PX-1251
- PX-1252
- PX-1253
- PX-1254
- PX-1255
- PX-1256
- PX-1257
- PX-1258
- PX-1259
- PX-1260
- PX-1261
- PX-1263
- PX-1264
- PX-1265
- PX-1266

Specific Objections

In addition to the General Objections set forth above, which are incorporated by reference, Lawson makes the specific objections to ePlus's exhibits as are set forth in Exhibit A.

DATED: March 18, 2013

LAWSON SOFTWARE, INC.

By: /s/ Stanley W. Hammer
Of Counsel

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Counsel for Defendant Lawson Software, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March 2013, I will electronically file the foregoing

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with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) via email to the following:

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